REMARKS

In an Office Action mailed on October 3, 2007, claims 1, 7, 16 and 21 were rejected under 35 U.S.C. § 102(b) as being anticipated by Saurenman; claims 1, 2 and 15 were rejected under 35 U.S.C. § 102(b) as being anticipated by Henshaw; claims 32-44, 46-49, 51-53 and 55 were allowed; and claims 17-20 and 23-28 were objected to as being dependent upon rejected base claims but were indicated as being allowable if rewritten in independent form.

The Office Action does not address claim 9. Therefore, clarification of the status of claim 9 is respectfully requested.

Independent claim 1 stands rejected under 35 U.S.C. § 102 (b) as being anticipated by Saurenman or Henshaw. As amended, the method of independent claim 1 recites energizing a spring before running the spring downhole, including twisting the spring to reduce a diameter of the spring while maintaining the spring at the same axial length.

Contrary to the limitations of independent claim 1, both Saurenman and Henshaw disclose winding a spring using a technique that involves changing the axial length of the spring. More specifically, Saurenman discloses a packer element 19 whose diameter is reduced "by movement of the collars 32 and 33 relative to one another." Saurenman, 3:60-63. The movement of the collars 32 and 32, in turn, changes the axial length of the element 19, and as such, Saurenman fails to disclose the limitations of amended independent claim 1.

Henshaw discloses an arrangement in which a guide 17 is turned to wind a spring 15. The winding of the spring 15 causes the spring 15 to axially contract. In this regard, Henshaw discloses that the guide 17 (which is connected to the end of the spring 15) may be slipped upwardly over the lower end of the packer 14. For this to occur (i.e., for axial movement of the guide 17 to occur), the spring 15 must contract along its axial length. As such, Henshaw also fails to anticipate amended independent claim 1.

Independent claims 16 and 21 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Saurenman. Each of these claims recites a spring that includes a tubular member that has a helical groove, which is a feature that is neither taught nor even suggested by Saurenman.

More specifically, the packer element 19 of Saurenman appears to be made from a treated fabric. *See, for example*, Saurenman, 4:2-22. Although Figs. 3 and 2 depict a helically wound support member, such as a rod, there is no reason to believe that the packer element 19 contains a

helical groove. Such a groove would be inconsistent with forming the packer element 19 from a flexible material, such as fabric. Therefore, for at least the reason that Saurenman fails to teach or even suggest a tubular member that contains a helical groove, Saurenman fails to anticipate independent claims 16 and 21.

Dependent claims 2, 7, 9 and 15 are patentable for at least the reason that these claims depend from allowable claims.

CONCLUSION

In view of the foregoing, Applicant respectfully requests a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0317US).

Respectfully submitted,

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